

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JILL BABCOCK, et al.,

Case No.: 2:22-cv-12951

Plaintiffs,

JUDGE JONATHAN J.C. GREY

v.

STATE OF MICHIGAN, et al.,

Defendants.

**PLAINTIFFS' *EX PARTE* MOTION TO
EXCEED PAGE LIMIT FOR PLAINTIFFS' BRIEFS
[ECF No. 92] and [ECF No. 95] IN RESPONSE TO MOTIONS TO DISMISS
BY STATE OF MICHIGAN [ECF No. 82] AND
BY DETROIT WAYNE JOINT BUILDING AUTHORITY [ECF No. 80]**

Plaintiffs Jill Babcock, Marguerite Maddox, and Ashley Jacobson, through undersigned counsel, respectfully request this Court grant leave to Plaintiffs to exceed the L.R. 7.1(d)(3) 25-page limit for Plaintiffs' briefs as follows:

- a. Our Opposition Brief ECF No. 92 exceeds the limit by 7 pages as to State's Motion and Brief, ECF No. 82.
- b. Our opposition Brief ECF No. 95 exceeds the limit by 3 pages as to DWJBA's Motion and Brief, ECF No. 80.

This case is factually and legally complicated, and to accurately document the factual allegations and to effectively argue applicable law, Plaintiffs' counsel were required to exceed the 25-page limit on the above two briefs.

By cross-referencing responses to Defendants' duplicate arguments in all four motions, Plaintiffs' counsel used 16 pages each in opposition briefs ECF No. 93 and ECF No. 94 responding to City ECF No. 87 and County ECF No 88.

Accordingly, Plaintiffs request this Court extend the page limit in ECF No. 92 to 32 pages and in ECF No. 95 to 28 pages.

Respectfully Submitted,

Dated: September 10, 2023

/s/ Michael W. Bartnik

MICHAEL W. BARTNIK (P32534)
Law For Baby Boomers, PLLC
41000 Woodward Ave., Ste. 350
Bloomfield Hills, Michigan 48304
(248) 608-3660 Telephone
michaelbartnik@protonmail.com

Elizabeth K. Abdnour (P78203)
Abdnour Weiker, LLP
500 E. Michigan Ave., Ste. 130
Lansing, Michigan 48912
(517) 994-1776 Telephone
liz@education-rights.com

Renee A. Stromski (Ohio 0101347)
Abdnour Weiker, LLP
262 South Third St.
Columbus, Ohio 43215
(216) 714-1515 Telephone
renee@education-rights.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Michael W. Bartnik, counsel for Plaintiffs, certify that on September 10, 2023, I filed this document by use of this Court's ECF system, which will serve copies to all counsel of record.

September 10, 2023

/s/ Michael W. Bartnik

Michael W. Bartnik

LOCAL RULE CERTIFICATION

I, Michael W. Bartnik, certify that this document complies with Local Rule 5.1(a), including: double-spaced (except for quoted materials and footnotes); at least one-inch margins on the top, sides, and bottom; consecutive page numbering; and type size of all text and footnotes that is no smaller than 10-1/2 characters per inch (for non-proportional fonts) or 14 point (for proportional fonts). I also certify that it is the appropriate length. Local Rule 7.1(d)(3).

September 10, 2023

/s/ Michael W. Bartnik

Michael W. Bartnik